

REMARKS

Claims 1-21 are pending in the application.

Claims 1-21 stand rejected.

Claim 7 has been amended.

Rejection Under 35 USC § 102

Claims 1-5, 8-16, and 19-21 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,826,600 ("Russell"). (Instant Office Action, p. 2.) Applicants traverse this rejection.

Claim 1

Claim 1 reads:

1. A method comprising:

- a computer system creating a first storage object, wherein the first storage object is created to have a property;
- the computer system creating a second storage object out of the first storage object, wherein the second storage object depends on the property of the first storage object;
- the computer system modifying the first storage object, wherein the modified first storage object maintains the property upon which the second storage object depends.

The Instant Office Action argues, in the following manner, that Russell teaches the elements of claim 1:

Regarding claim 1, Russell discloses a method comprising a computer system (100, figure 1) creating a first storage object (150, figure 1), wherein the first storage object is created to have a property (col. 10 lines 58-61 and col. 14 lines 13-18, i.e., a client computer system operating software to generate local object definitions and object property 152 being a local object identification that identifies the local object definitions), the computer system creating a second storage object out of the first storage

object, wherein the second storage object depends on the property of the first storage object (col. 11 lines 2-10 and col. 14 lines 29-54, i.e., a sever creating a global object specification corresponding local object definitions), and the computer system modifying the first storage object, wherein the modified first storage object maintains the property upon which the second storage object depends (col. 11 lines 10-24, col. 14 lines 55-62 and col. 15 lines 16-22, i.e., providing new global object specification object definitions to the client and replacing the local object specification with the new global object specification). (Instant Office Action, pp 2-3.) (Emphasis Added.)

Thus it appears that the Instant Office Action identifies (1) Russell's local object specification 150 with the first storage object of claim 1, (2) Russell's local object identification 152 with the property of the first storage object of claim 1, and (3) Russell's global object specification 160 with the second storage object of claim 1. (See Russell column 12, lines 1-5 for the first of many instances in which Russell identifies 160 with the global object specification.)

While the Applicants fail to endorse these identifications, they argue herein that, assuming these identifications, it is clear that Russell teaches that the modified first storage object does *not* maintain the property upon which the second storage object depends. Since claim 1 requires the modified first storage object to maintain the property upon which the second storage object depends, it follows that, assuming these identifications, Russell fails to teach claim 1, for at least this reason.

In order to see why Russell, assuming the above identifications, teaches that the modified first storage object does *not* maintain the property upon which the second storage object depends, refer to FIG. 3 of Russell along with the following portions of the cited sections of Russell:

...Assuming the server properly creates the global object specification, the client replaces the local object specification with the global object specification such that the client can operate on (e.g., can manipulate or otherwise reference) global object definitions that are guaranteed to be uniquely identified. (Russell, column 11, lines 19-24.) (Emphasis Added.)

...In this manner, each global object definition 161 that the server 132 creates is essentially a duplicate of a corresponding local object definition 151 except that the server 132 replaces the local object identification 152 with a global object identification 162. In this manner, the server 132 can be certain that the global object identification 162 for each global object definition 161 is unique for every object definition 161.

Returning attention now to FIG. 2B, once the server 132 performs step 211 as explained above, processing proceeds to step 212 at which point the server 132 provides the new global object specification 160 back to the client 130. While not shown in these processing steps, the server 132 also maintains a copy of the global object specification 160 for distribution to other client computer systems (e.g., 101-M), as will be explained. (Russell, column 14, lines 29-62) (Emphasis Added.)

According to the aforementioned description, the operation of the client 130 and the server 132 allows a client computer system 101 to create objects as needed for an object oriented client/server software system without being concerned if an object identification associated with those objects is unique across all other clients and the server. Then, upon distribution of the object definitions from the client computer system 101 to server computer system 102, the server 132 assigns a new and unique global object identification to each of the object definitions created by the client 130 and then returns to a copy of those unique global object identifications as a global object specification 160 back to the client 130. Using these mechanisms and techniques, clients (e.g., client 130) are able to create objects as required and can then transfer these objects to the server which is responsible for providing a unique identification for the objects. These techniques are quite beneficial in object oriented client/server systems such as collaboration software systems in which many clients may create objects, some of which may contain local object identifications which are the same. Since the server 132 of the invention operates to replace any local object identifications 151 within a local object specification 150 with global object identifications 161 having a global unique identification 162 in a global object specification 160, the server 132 can guarantee that no two object definitions contain the same global object identification 162. (Russell, column 15, lines 16-22.)

Since FIG. 3 shows that 150 consists of the local object identifications 151, it is clear from these citations that (1) the global object specification 160 is “essentially” a duplicate of local object specification 150, except that local object identification 152 is replaced with global object identification 162; (2) local object specification 150 is replaced by global object specification 160 (as claimed on p. 3 of the Instant Office Action); and (3) local object identification 152 is not the same as global object identification 162 since 152 is replaced by 162 and 162 is “new and unique.”

Now, granting, solely for the sake of argument, that replacing local object specification 150 with global object specification 160 results in a modification of (rather than the destruction of) local object specification 150, it follows that the new local object specification 150 no longer has the local object identification 152. Thus, given the identification of local object specification 150 with the first storage object and the identification of local object identification 152 with the property of the first storage object, as set forth in the Instant Office Action, it follows that Russell teaches that the first storage object no longer has the property upon which the second storage object depends. Thus, assuming the identifications set forth in the Instant Office Action, Russell teaches that the modified first storage object does *not* maintain the property upon which the second storage object depends.

There is some evidence that the Instant Office Action intended to identify local object definitions 151 with the property of the first storage object of claim 1. In order to show that Russell teaches that the second storage object depends upon the property of the first storage object, the Instant Office Action asserts that “col. 11 lines 2-10 and col. 14 lines 29-54” teach “a server creating a global object specification corresponding local object definitions.” (Instant Office Action, p. 2.) However, setting aside the fact that this identification is inconsistent with identifying local object identification 152 with the property of the first storage object, as required by a previous portion of the Instant Office Action, making this identification produces the same result as identifying the local object identification 152 with the property of the first storage object. As shown in FIG. 3 of Russell, the local object definitions 151 comprise the local object identification 152. Thus, since Russell teaches that the new local object specification 150 no longer has the local object identification 152, it also teaches that the new local object specification 150 no longer has the same local object definitions 151. It follows from this, that,

once again, Russell teaches that the modified first storage object does *not* maintain the property upon which the second storage object depends

Thus, aside from appearing to trade on inconsistencies among other problems, the cited sections fail to show that Russell teaches that the modified first storage object maintains the property upon which the second storage object depends. For at least this reason, the Applicants respectfully request that the Examiner withdraw this § 102 rejection of claim1.

### Claim 8

Claim 8 reads:

8. A method comprising:

- a computer system creating one or more first storage objects, wherein the one or more first storage objects are created to have individual or collective properties;
- the computer system creating a second storage object out of the one or more first storage objects, wherein the second storage object depends on the individual or collective properties of the one or more first storage objects;
- the computer system receiving information that the property of a storage object of the one or more first storage objects has changed and that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects;
- the computer system responding after receiving the information.

The Instant Office Action argues, in the following manner, that Russell teaches the elements of claim 1:

Regarding claim8, Russell discloses a method comprising a computer system (100, figure 1) creating a first storage object (150, figure 1), wherein the first storage object is created to have a individual or collective properties (col. 10 lines 58-61 and col. 14 lines 13-18, i.e., a client computer system operating software to generate local object definitions and object property 152 being a local object identification that identifies the

local object definitions), the computer system creating a second storage object out of the first storage object, wherein the second storage object depends on the individual or collective properties of the first storage object (col. 11 lines 2-10 and col. 14 lines 29-54, i.e., a sever creating a global object specification corresponding local object definitions), and the computer system receiving information that the property of a storage object of the one or more first storage objects has changed and that the second object can no longer depend on the individual or collective properties of the one or more first storage object (col. 11 lines 10-24, col. 18 lines 12-16, i.e., determining that the local in global object specifications do not contain corresponding object definitions), the computer system responding after receiving the information (col. 18 lines 16-21, i.e., providing an indication that it did not map the local object specification to the global object specification).

Thus, it appears that the Instant Office Action identifies (1) Russell's local object specification 150 with the first storage object of claim 8, (2) Russell's local object identification 152 with the individual or collective properties of the first storage object of claim 8, and (3) Russell's global object specification 160 with the second storage object of claim 8. Further, the Instant Office Action appeals to column 11, lines 10-24 and column 18, lines 12-21 in support of the assertion that Russell teaches the elements of claim 8 that require

the computer system receiving information that the property of a storage object of the one or more first storage objects has changed and that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects;  
the computer system responding after receiving the information.

However, there is no teaching in the citations provided by the Instant Office Action that the computer system receives information that the second storage object can no longer *depend* on the individual or collective properties of the one or more first storage objects. These citations read as follows:

The server can then return the global object specification containing the uniquely identified global object definitions to the client. The client can then compare the global object specification to the local object specification (still in the client) to determine if the server properly created the global object specification based on the local object specification (e.g., to be sure that the server created a global object definition for each

local object definition that the client initially provided to the server). Assuming the server properly creates the global object specification, the client replaces the local object specification with the global object specification such that the client can operate on (e.g., can manipulate or otherwise reference) global object definitions that are guaranteed to be uniquely identified. (Russell, column 11, lines 10-24.)

In step 318, if the client 130 determines that the local in global object specifications 150 and 160 do not contain corresponding object definitions 151 in 161 (e.g., there is a local object definition 151 for which there is no corresponding global object definition 161), processing proceeds to step 319 at which point the client 130 provides an indication of an error back to the server 132 in the server computer system 102. This indicates to the server 132 that it did not properly map the local object specification 150 to the global object specification 160. (Russell, column 18, lines 12-21.)

Notice that there is no explicit discussion of “dependence” of any kind in these citations, let alone the receiving of information about dependence. Neither the word “depends,” nor the word “dependence,” nor any synonyms of these words appear within the citations. Further, the only reference in these citations to information that is sent or received is “an indication of an error” which “indicates to the server 132 that it did not properly map the local object specification 150.” But notice that this error message indicates to the server information **about** the server (namely, that the server failed to map the local object specification 150), it does not indicate information **about** the global object specification 160, which the Instant Office Action identifies with the second storage object. Thus, for at least this reason, it is clear that the Instant Office Action has not shown that Russell teaches that the computer system receives information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects.

However, even if the error message did indicate to the server information **about** the global object specification 160, the fact that the error message “indicates to the server 132 that it did not properly map the local object specification 150” does not teach, either directly or indirectly, that the global object specification 160 can no longer **depend** upon local object

identification 152 (which the Instant Office Action identifies with the individual or collective properties of the one or more first storage objects). It may be that the mapping was not properly performed, but this does not imply that the global object specification 160 cannot still depend upon local object identification 152. Thus, for at least this further reason, it is clear that the Instant Office Action has not shown that Russell teaches that the computer system receives information that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects.

For at least these reasons, the Applicants respectfully request that the Examiner withdraw this § 102 rejection of claim 8.

Claims 12, 19, 20, and 21

Since claims 12, 19, 20, and 21 each require that the modified storage object maintains the property or properties upon which the second storage object depends, Applicants respectfully request that the Examiner withdraw this § 102 rejection of these claims.

Claims 2-5, 9-11, and 13-16

Since claims 2-5, 9-11, and 13-16 are, respectively, dependent upon allowable independent claims 1, 8, and 12, Applicants respectfully request that the Examiner withdraw this § 102 rejection of these claims.

Rejection Under 35 USC § 103



Claims 6-7 and 17-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. patent 6,826,600 ("Russell") in view of U.S. application 2003/0229698 ("Furuhashi").

Applicants traverse this rejection.

Since claims 6-7 are dependent upon allowable independent claim 1 and claims 17-18 are dependent upon allowable independent claim 12, these claims are allowable and Applicants respectfully request that the Examiner withdraw this § 103 rejection of these claims.

### CONCLUSION

Applicant(s) submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia, 22313-1450, on February 2, 2007.

  
Attorney for Applicant(s)

2/2/07  
Date of Signature

Respectfully submitted,



Eric A. Stephenson  
Attorney for Applicant(s)  
Reg. No. 38,321  
Telephone: (512) 439-5093  
Facsimile: (512) 439-5099